

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

CIV 24 857 SLP
 Case No. _____
 (to be filled in by the Clerk's Office)

Gary Leon Williams

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

OMES Riskmanagement

Ronda Acton / see Attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

FILED

AUG 20 2024

JOAN KANE, CLERK
 U.S. DIST. COURT, WESTERN DIST. OKLA.
 BY ef, DEPUTY

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Gary Williams

Street Address

2435 NE 10th St Apt 1

City and County

Okla. City, OK 73117

State and Zip Code

405-223-8818

Telephone Number

Williamsgary526@gmail

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name

OMES Risk Management

Job or Title (if known)

2401 N. Lincoln

Street Address

OKla. City, OK 73105

City and County

Suite 118

State and Zip Code

405-521-4999

Telephone Number

E-mail Address (if known)

ORR@omes.ok.gov

Defendant No. 2

Name

Ronda Acton

Job or Title (if known)

Risk-management Coordinator

Street Address

2401 N. Lincoln

City and County

OKla. City, OK 73105

State and Zip Code

Suite 118

Telephone Number

405) 521-4999

E-mail Address (if known)

ORR@omes.ok.gov

Defendant No. 3

Name

Vicki U. Booth

Job or Title (if known)

President and Board Chair

Street Address

3310 West End Avenue, Suite 700

City and County

Nashville, Tennessee 37203

State and Zip Code

+ 615-269-8175

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Peter F. Lyle

Job or Title (if known)

Executive Vice President

Street Address

3310 West End Avenue, Suite 700

City and County

Nashville, Tennessee 37203

State and Zip Code

615-269-8175

Telephone Number

E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

75 OKla. Stat. §250.1

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Todd J. Meredith, is a citizen of the State of (name) Nashville. Or is a citizen of (foreign nation) _____.

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b. If the defendant is a corporation

The defendant, (name) Healthcare Realty Trust, is incorporated under the laws of the State of (name) Oklahoma, and has its principal place of business in the State of (name) Oklahoma City.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Noneconomic Damages

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On I was false arrested on July 27, 2021 at Integris Baptist Hospital, was detained for over 2 plus years in the Oklahoma County Jail awaiting trial, and on August 23, 2023 I was forced to plead to several counts that weren't committed and all of this was possible with gross neglect of the administration procedures laws not done by the defendant.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. I incurred a fractured nose and several stitches, also have been diagnosed with PTSD by physician, also having to continue care about nose damage with a physician, Plaintiff in this request the honorable court Grant noneconomic damages, Post Judgement with the Periodic Payment of Future Damages, also add the contempt fine.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 8-20-24

Signature of Plaintiff

Printed Name of Plaintiff

Mary Williams
Gary Williams

B. For Attorneys

Date of signing: 8-20-24

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Mary Williams
Gary Williams

2435 NE 10th St Apt 1

OKla. City, OK 73117

405) 223-8818

Williamsgary526@gmail